

Rajan O. Dhungana
 NV Bar# 13102
 FEDERAL PRACTICE GROUP
 7320 S. Rainbow Blvd., Ste. 102-360
 Las Vegas, NV 89139
 O: 714.491.8188
 rdhungana@fedpractice.com
 Designated Resident Nevada Counsel for Plaintiff Kirstin Blaise Lobato

Elizabeth Wang*
 LOEVY & LOEVY
 2060 Broadway, Ste. 460
 Boulder, CO 80302
 O: 720.328.5642
 elizabethw@loevy.com

David B. Owens*
 Megan Pierce*
 LOEVY & LOEVY
 311 N. Aberdeen St., 3rd Fl.
 Chicago, IL 60607
 O: 312.243.5900
 megan@loevy.com
 *Admitted *pro hac vice*
 Counsel for Plaintiff Kirstin Blaise Lobato

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

KIRSTIN BLAISE LOBATO,)	
)	Case No. 2:19-cv-01273
Plaintiff,)	
v.)	Judge Richard F. Boulware, II
)	
LAS VEGAS METROPOLITAN)	Magistrate Judge Elayna J. Youchah
POLICE DEPARTMENT, NEVADA,)	
THOMAS THOWSEN, and JAMES)	
LAROCHELLE,)	
)	STIPULATION TO EXTEND
)	BRIEFING SCHEDULE OF
Defendants.)	DEFENDANTS' POST-TRIAL
)	MOTIONS AND FOR PLAINTIFF
)	TO FILE A RESPONSE IN EXCESS
)	OF THE PAGE LIMIT
)	
)	
)	(Second Request)

Plaintiff Kirstin Blaise Lobato, by and through counsel of record, and
 Defendants Las Vegas Metropolitan Police Department, Thomas Thowsen, and

James LaRochelle, through their counsel of record, hereby stipulate to the following:

1. Judgment was entered against Defendants in this matter on January 6, 2025. Dkt. 207.
2. Defendants filed a motion for a new trial and a motion for judgment as a matter of law on February 3, 2025. Dkts. 214, 216.
3. The parties filed a stipulation extending Plaintiff's deadline to respond to these motions from February 18, 2025 to March 7, 2025 and also stipulating to Plaintiff filing a single omnibus response to both motions. Dkt. 221.
4. The parties now further stipulate to an extension to March 11, 2025, for Plaintiff to file her response, due to undersigned counsel having to travel on March 4th and 5th and an oral argument before the Missouri Court of Appeals on March 5th in *Holmes v. Zellers*, Case No. ED112676 (which was initially scheduled for February 19th but was rescheduled due to inclement weather).
5. Plaintiff's counsel has conferred with counsel for Defendants and the parties have agreed to this extension of time.

RESPECTFULLY SUBMITTED,

/s/David B. Owens
One of Plaintiff's Attorneys

/s/Craig Anderson
One of Defendants' Attorneys

1 Rajan O. Dhungana
2 NV Bar# 13102
3 FEDERAL PRACTICE GROUP
4 7320 S. Rainbow Blvd., Ste. 102-360
5 Las Vegas, NV 89139
rdhungana@fedpractice.com
O: 714.491.8188
Designated Resident Nevada Counsel for
Plaintiff Kirstin Blaise Lobato

6 David B. Owens *
7 Megan Pierce*
8 Loevy & Loevy
9 311 North Aberdeen St., 3rd Floor
Chicago, IL 60607
T: (312) 243-5900
F: (312) 243-5902
10 megan@loevy.com
11 *Admitted *pro hac vice*
12 *Counsel for Plaintiff Kirstin Blaise Lobato*

Craig Anderson
Kathleen Wilde
Marquis Aurbach Coffing
1001 Park Run Drive
Las Vegas, NV 89145
T: (702) 942-2136
canderson@maclaw.com
Counsel for Defendants

Elizabeth Wang*
Loevy & Loevy
2060 Broadway, Ste. 460
Boulder, CO 80302
T: (312) 243-5900
F: (312) 243-5902
elizabethw@loevy.com
*Admitted *pro hac vice*
Counsel for Plaintiff Kirstin Blaise
Lobato

ORDER

IT IS SO ORDERED that the above Stipulation is hereby GRANTED. Plaintiff shall have until March 11, 2025, to file her omnibus response. Responses shall be due March 25, 2025.

DATED this 3rd day of March, 2025.


U.S. MAGISTRATE JUDGE